



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

FEB 22 2010

Mr. Rick Johnson  
Colorado River Science Director  
Grand Canyon Trust  
2601 North Fort Valley Road  
Flagstaff, Arizona 86001

Dear Mr. Johnson:

On behalf of Secretary Salazar, I am responding to your letter dated October 23, 2009, regarding the *Glen Canyon Dam Annual Operating Plan*, in which you recommended that the Bureau of Reclamation change its monthly distribution of releases from Glen Canyon Dam (GCD). In your letter, you requested that the normal ongoing operation of GCD be modified to discharge 1/12<sup>th</sup> of the annual volume of water each month (which you refer to as "Equalized Monthly Volumes" or "EMV"), beginning in the 2010 water year, which began on October 1, 2009. You also suggested that such operations could be included in the 2010 Annual Operating Plan (AOP) for Colorado River System Reservoirs. We also recognize that the current operation of Glen Canyon Dam is the subject of ongoing litigation brought by your organization against the Bureau of Reclamation and the U.S. Fish and Wildlife Service.

The 2010 AOP was recently finalized, and as you are likely aware, it addresses operations for multiple Colorado River reservoirs and addresses multiple issues, not just operations of GCD. Modifying releases from GCD to an approach based on EMV, as your letter suggested, would be a significant modification of GCD operations. The 2010 Annual Operating Plan does not adopt an EMV operation for GCD. We believe that a more detailed hydrologic explanation of how your proposal would work under the numerous operating requirements applicable to GCD would facilitate a more detailed consideration of your suggestion. The Glen Canyon Dam Adaptive Management Program (GCDAMP) was specifically established to address ongoing concerns over the operation of GCD and effects on downstream resources. The GCDAMP includes a Federal Advisory Committee, the Glen Canyon Dam Adaptive Management Work Group (AMWG). We encourage you to address this issue through the GCDAMP and the AMWG, the appropriate fora to propose experimental and management changes to the operation of GCD for the improvement of environmental resources in the Grand Canyon.


Your letter also suggested that the Colorado River Management Work Group (CRMWG) should be chartered as a Federal Advisory Committee Act (FACA) group. The CRMWG is an ad hoc group of stakeholders who the Department consults with during the development of the AOP. For context, the CRMWG includes a mailing list of over 160 individuals, members of the general public, and organizations that are notified and included as part of the AOP consultation process. The AOP consultation process is one in which the Department of the Interior consults with a broad range of Federal, tribal, state and non-governmental interests as it prepares a report on the past and projected operations of the Colorado River each year as required by the Colorado River Basin Project Act. Meetings of the CRMWG provide the opportunity for the Department and Reclamation to share important information with the parties (including information regarding past and projected hydrologic conditions and past and projected operations) and to discuss the specific information that will be included in the report. As you know, this year we held three public consultation meetings on the 2010 AOP, and a representative of the

Grand Canyon Trust attended the first of these consultation meetings. This process enables us to involve interested parties and to consider their comments.

With respect to FACA, in order to establish an advisory committee, an agency has to provide an explanation stating why the advisory committee's functions cannot be performed by the agency, another existing committee, or other means, such as public hearings. 41 C.F.R. § 102-3.60(b)(2). As you know, there is already an existing FACA committee designed to seek public participation in Glen Canyon Dam management: the AMWG, on which you serve as Grand Canyon Trust's representative. As noted above, there also have been multiple public consultation meetings with respect to development of previous AOPs. We will hold additional public consultation meetings in the future as appropriate. Chartering the CRMWG as a FACA committee is not only unnecessary, it would be discouraged by the FACA regulations.

Thank you for your letter and ongoing interest in the resources of the Colorado River. We recognize your concern and interest in management of Glen Canyon Dam, and we will continue to work with you on these important issues. If you have any questions or concerns, you may contact Mr. Dave Trueman, Manager of Reclamation's Upper Colorado Region Resources Management Division, at 801-524-3759.

Sincerely,



Anne J. Castle  
Assistant Secretary  
for Water and Science

Identical letter sent to:

Mr. Nikolai Lash  
Grand Canyon Trust  
2601 North Fort Valley Road  
Flagstaff, Arizona 86001